

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION GULFPORT**

REPUBLICAN NATIONAL COMMITTEE;
MISSISSIPPI REPUBLICAN PARTY; JAMES
PERRY; and MATTHEW LAMB,

Plaintiffs,

v.

JUSTIN WETZEL, *in his official capacity as
the clerk and registrar of the Circuit Court of
Harrison County*; TONI JO DIAZ, BECKY
PAYNE, BARBARA KIMBALL, CHRISTENE
BRICE, and CAROLYN HANDLER, *in their
official capacities as members of the Harrison
County Election Commission*; and MICHAEL
WATSON, *in his official capacity as the
Secretary of State of Mississippi*,

Defendants,

VET VOICE FOUNDATION and
MISSISSIPPI ALLIANCE OF RETIRED
AMERICANS,

Intervenor-Defendants.

No. 1:24-cv-00025-LG-RPM
(Lead Case)

**DECLARATION OF ASHLEY
WALUKEVICH**

LIBERTARIAN PARTY OF MISSISSIPPI,

Plaintiff,

v.

JUSTIN WETZEL, *in his official capacity as
the clerk and registrar of the Circuit Court of
Harrison County, et al.*,

Defendants.

No. 1:24-cv-00037-LG-RPM
(Consolidated Case)

I, Ashley Walukevich, declare:

1. I am the Deputy Political Director of the Republican National Committee (RNC). I am over the age of eighteen and I have personal knowledge of the following facts. If called as a witness, I could and would competently testify thereto.

2. The RNC is the national committee of the Republican Party, with its principal place of business at 310 First Street S.E., Washington D.C., 20003. The RNC represents over 30 million registered Republicans in all 50 states, the District of Columbia, and the U.S. territories. It is comprised of 168 voting members representing state Republican Party organizations.

3. The RNC manages the Republican Party's business at the national level, coordinates fundraising and election strategy, and develops and promotes the national Republican platform.

4. The RNC organizes and operates the Republican National Convention, which nominates a candidate for President and Vice President of the United States.

5. The RNC works to elect Republican candidates to state and federal office. In November 2024, its candidates will appear on the ballot in Mississippi for election to the Presidency, U.S. Senate, and U.S. House of Representatives.

6. The RNC engages in various activities to help elect Republicans in Mississippi. One of these activities is providing support to the Mississippi Republican Party in its efforts to elect Republicans.

7. The RNC has vital interests in protecting the ability of Republican voters to cast, and Republican candidates to receive, effective votes in Mississippi elections and elsewhere. The RNC is a plaintiff in this case to vindicate its own rights in this regard, and in a representational capacity to vindicate the rights of its members, affiliated voters, and candidates.

8. Federal law provides for Election Day to take place on the Tuesday after the first Monday in November, which for the upcoming general election will be November 5, 2024.

9. Mississippi's mail-in ballot deadline violates federal law by accepting and counting mail-in ballots received up to five business days after Election Day, which for the upcoming general election will be November 12.

10. The RNC has interests in preventing Mississippi's unlawful mail-in ballot deadlines. Mississippi's mail-in deadline forces the RNC to divert resources and spend money on absentee-specific programs and post-election activities. The mail-in ballot deadline also specifically and disproportionately harms Republican candidates.

11. Among other activities, the RNC funds and engages in ballot "chase" programs whereby it contacts voters, educates them about the mail-in voting process, informs them of key deadlines and rules, reminds them to return their mail-in ballots in a timely manner, and encourages them to cure any defects as permitted by state law. The voter education component is particularly labor intensive.

12. To protect its electoral interests and maintain competitive parity with other political parties, the RNC must fund and engage in ballot chase programs through the latest possible moment those ballots can be counted. The later a jurisdiction permits voters to return mail-in ballots, the later the RNC must run its ballot chase programs in that jurisdiction, and the more resources it must devote to those programs.

13. Because Mississippi counts mail-in ballots that are received after Election Day, the RNC must expend resources on ballot chase programs at least through Election Day. It must continue to contact voters, educate them, provide resources, and encourage voters to return their mail-in ballots through the day of the election, even if those mail-in ballots would be received after Election Day.

14. The RNC also spends significant resources to preserve voter confidence and turnout, which suffer when voters see that election officials continue to count ballots that are received after Election Day.

15. The RNC also devotes substantial time and resources to election-day and post-election activities such as poll watchers.

16. The RNC recruits poll watchers to observe voting and the counting of ballots on Election Day. Poll watchers are also needed to observe counting mail-in ballots on Election Day and the five business days after Election Day.

17. The RNC devotes substantial resources to poll-watching activities, including by recruiting employees and volunteers, organizing poll-watching efforts, affording training, and providing funds to state and local parties to support poll-watching efforts.

18. Because Mississippi allows ballots to be received and counted up to five business days after Election Day, the RNC must devote resources to poll-watching efforts for the five business days after Election Day. If Mississippi did not count post-election-day ballots, the RNC would spend those resources on other activities, or not spend them at all.

19. Late-arriving mail-in ballots often have errors and other discrepancies that are caught by poll watchers, such as insufficient information, missing witness signatures, affidavits, dates, or postmarks. Allowing mail-in ballots to be received after election day thus increases the number of ballots with errors, which in turn increases the need for adequately trained poll watchers.

20. Mississippi's mail-in ballot deadline specifically harms Republican candidates and voters. Democratic voters tend to mail their ballots later on average than Republican voters, which results in late-arriving ballots favoring Democratic candidates. And because voting by mail is starkly polarized by party, Mississippi's late deadline heavily favors Democratic candidates and harms Republican candidates.

21. Late-arriving ballots that skew heavily in favor of one party undermine confidence in the integrity of the election, dilute the timely votes of Republican voters, and harm the RNC, its members, and voters.

22. Because Mississippi's mail-in ballot deadline violates federal law, it results in an inaccurate tally of the lawfully cast votes. That inaccurate vote tally undermines the Republican candidates' rights to a fair and accurate electoral count, and it undermines confidence in the election.

23. Because the RNC's resources are finite, it can expend resources to respond to Mississippi's mail-in ballot deadline only by diverting them from the pursuit of its mission in other areas.

24. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: March 25, 2024

A handwritten signature in dark ink, appearing to read "Aubrey Wall", is written over a horizontal line.